

# **EXHIBIT A**

# BakerHostetler

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August 22, 2019

Robert Julian  
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## VIA EMAIL ([korsini@cravath.com](mailto:korsini@cravath.com))

Kevin J. Orsini, Esq.  
Cravath, Swaine & More LLP  
Worldwide Plaza  
825 Eighth Avenue  
New York, NY 10019-7475

*Re: In re PG&E Corporation and Pacific Gas and Electric Company, Case No. 19-30088  
(DM) (Jointly Administered)*

Dear Mr. Orsini:

During the hearing before Judge Montali on the Motion for Relief from Stay, the Debtors stated their intention to deny liability as to all of the fires that will be the subject of the estimation proceedings. We assume the broad based denial is grounded in good faith, based on the Debtors' analysis of the Cal Fire reports, investigation of the facts with their employees, and examination of the physical and documentary evidence in their possession, custody or control. Since the TCC and the fire victims have not had similar access to the evidence, and in order to meaningfully prepare for the hearing on August 27<sup>th</sup>, we request the Debtors provide the TCC and the Court in advance of the August 27<sup>th</sup> hearing with: (1) the factual and legal bases supporting their denial of liability for each fire (including any affirmative defenses); (2) the names of witnesses you contend will support PG&E's denial of liability; and (3) any documents and physical evidence which PG&E will rely upon to support their denials. We believe such disclosures are essential in order to assess the discovery necessary to meet the time frame for any estimation process. A set of standard contention interrogatories along this line are enclosed. We will separately follow up this letter with a request for the production of specific documents that we believe the Debtors should produce immediately in connection with this process.

Atlanta      Chicago      Cincinnati      Cleveland      Columbus      Costa Mesa      Denver  
Houston      Los Angeles      New York      Orlando      Philadelphia      Seattle      Washington, DC

Kevin J. Orsini  
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Sincerely,

A handwritten signature in blue ink, appearing to read "Julian".

Robert Julian  
Partner

Enclosure

cc: (Via Email):

Benjamin P. McCallen  
Gregory A. Bray  
Frank M. Pitre  
Michael A. Kelly

BAKER & HOSTETLER LLP  
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11 | *Counsel to the Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

- 21   □ Affects PG&E Corporation
  - 22   □ Affects Pacific Gas and Electric Company
  - 23   ■ Affects both Debtors

24 \*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)

Bankruptcy Case  
No. 19-30088 (DM)  
  
Chapter 11  
  
(Lead Case)  
  
(Jointly Administered)

**FIRST SET OF INTERROGATORIES OF  
THE OFFICIAL COMMITTEE OF  
TORT CLAIMANTS TO THE DEBTORS  
PG&E CORPORATION AND PACIFIC  
GAS AND ELECTRIC COMPANY**

1                   **OFFICIAL COMMITTEE OF TORT CLAIMANT'S COMMITTEE'S SECOND SET OF**  
2                   **INTERROGATORIES UNDER FED. R. BANKR. 2004 TO DEBTORS**

3                   Pursuant to Fed. R. Bankr. P. 9014 and 7033 (FRCP 33), and Paragraph 37 of the Second  
4                   Amended Order Implementing Certain Notice and Case Management Procedures, dated May 13,  
5                   2019 (Dkt No. 1996), the Official Committee of Tort Claimants (the "TCC"), by and through their  
6                   attorneys, hereby serve the following interrogatories (the "Interrogatories") on PG&E  
7                   Corporation and Pacific Gas and Electric Company (collectively, the "Debtors"), to be answered  
8                   with written responses to the law offices of Baker & Hostetler LLP, 1160 Battery Street, Suite 100,  
9                   San Francisco, CA 94111 within 7 days day after service upon the Debtors.

11                   **DEFINITIONS AND INSTRUCTIONS**

12                   1.         "And/Or" shall be construed either disjunctively or conjunctively as necessary to  
13                   bring within the scope of the discovery request all responses that might otherwise be construed to  
14                   be outside of its scope.

15                   2.         The terms "You" or "Your" means Debtor Pacific Gas & Electric Company and  
16                   Debtor PG&E Corporation, both collectively and individually as a single Debtor.

17                   3.         The terms "Fire" or "Fires" shall have the following meaning: the "2017 and 2018  
18                   Northern California Wildfires" defined and used by the Debtors in the Amended Declaration of  
19                   Jason P. Wells in Support of First Day Motions and Related Relief (Dkt No. 263) filed on February  
20                   1, 2019.

21                   4.         The term "Cal Fire Report" shall mean the following reports issued by the California  
22                   Department of Forestry and Fire Protection ("Cal Fire"), including the statements, findings, and  
23                   conclusions within those reports, as well as the statements, findings, and conclusions within any  
24                   attachments to those reports:

- 25                   a. Cal Fire Investigation Report, Case No. 17CAMRN0002957 (37)  
26                   b. Cal Fire Investigation Report, Case No. 17CALNU010050 (Adobe)  
27                   c. Cal Fire Investigation Report, Case No. 17CALNU010046 (Atlas)  
28                   d. Cal Fire Investigation Report, Case No. 17CAHUU008828 (Blue)  
                 e. Cal Fire Investigation Report, Case No. 17CANEU026269 (Cascade)  
                 f. Cal Fire Investigation Report, Case No. 17CABTU015933 (Cherokee)

- 1                   g. Cal Fire Investigation Report, Case No. 17CABTU015954 (La Porte)
- 2                   h. Cal Fire Investigation Report, Case No. 17CALNU010142 (Norr bom)
- 3                   i. Cal Fire Investigation Report, Case No. 17CALNU010049 (Nuns)
- 4                   j. Cal Fire Investigation Report, Case No. 17CALNU010051 (Partrick)
- 5                   k. Cal Fire Investigation Report, Case No. 17CALNU010057 (Pocket)
- 6                   l. Cal Fire Investigation Report, Case No. 17CATCU012170 (Point)
- 7                   m. Cal Fire Investigation Report, Case No. 17CALNU010348 (Pythian)
- 8                   n. Cal Fire Investigation Report, Case No. 17CAMEU012169 (Redwood)
- 9                   o. Cal Fire Investigation Report, Case No. 17CALNU010055 (Sulphur)
- 10                  p. Cal Fire Investigation Report, Case No. 17CALNU010045 (Tubbs)
- 11                  q. Cal Fire Investigation Report, Case No. 17CALNU010487 (Youngs)

12                 5. The term “CPUC Incident Investigation Report” shall mean the following reports  
13                 issued by the California Public Utilities Commission (“CPUC”) including the statements, findings,  
14                 conclusions within those reports, as well as the statements, findings, and conclusions within any  
15                 attachments to those reports:

- 16                  a. CPUC Incident Investigation Report, No. E20171010-02, Apr. 29, 2019 (Adobe)
- 17                  b. CPUC Incident Investigation Report, No. 171023-8596, May 2, 2019 (Atlas 1)
- 18                  c. CPUC Incident Investigation Report, No. 171020-8589, May 2, 2019 (Atlas 2)
- 19                  d. CPUC Incident Investigation Report, No. E20171020-06, May 6, 2019 (Cascade)
- 20                  e. CPUC Incident Investigation Report, No. E20171010-01, May 2, 2019 (Cherokee)
- 21                  f. CPUC Incident Investigation Report, No. E20171013-01, Apr. 29, 2019 (La Porte)
- 22                  g. CPUC Incident Investigation Report, No. E20171020-05, May 10, 2019(Norr bom)
- 23                  h. CPUC Incident Investigation Report, No. E20171016-01, Apr. 30, 2019 (Nuns)
- 24                  i. CPUC Incident Investigation Report, No. E20171020-02, May 10, 2019 (Partrick)
- 25                  j. CPUC Incident Investigation Report, No. E20171021-01, May 10, 2019 (Pocket)
- 26                  k. CPUC Incident Investigation Report, No. E20171009-03, Apr. 26, 2019 (Point)
- 27                  l. CPUC Incident Investigation Report, No. E20171020-03, May 1, 2019 (Pythian)
- 28                  m. CPUC Incident Investigation Report, No. E20171009-02, May 3, 2019 (Redwood)
- 29                  n. CPUC Incident Investigation Report, No. E20171011-02, May 10, 2019 (Sulphur)
- 30                  o. CPUC Incident Investigation Report, No. E20171026-01, May 13, 2019 (Tubbs)
- 31                  p. CPUC Incident Investigation Report, No. E20171020-01, May 6, 2019 (Youngs)

32                 6. To the extent you consider any of the following requests or interrogatories  
33                 objectionable, respond to so much of each, and each part thereof, which is not objectionable in your  
34                 view, and separately state that part of each which is objectionable and the ground for each objection.

35                 7. Provide a privilege log relating to Your responses to each of these Interrogatories  
36                 and all supporting documents, from which You are withholding information. The privilege log  
37                 must list the document or information withheld and the legal basis for withholding that information.

1           **INTERROGATORY NO. 1:**

2           If You contest any of the statements, findings, or conclusions of any Cal Fire Report or any  
3 CPUC Incident Investigation Report pertaining to any of the Fires, identify separately for each Fire:  
4           a. The factual basis for Your contention; and  
5           b. The legal basis for Your contention.

6           **INTERROGATORY NO. 2:**

7           To the extent You contend You are not legally liable for any of the Fires, state the following:

- 8           a. For each Fire, state separately all affirmative defenses upon which You intend to rely to  
9           support Your contention;  
10          b. For each Fire, state separately the legal basis for Your contention that You are not  
11           legally liable for that Fire;  
12          c. For each Fire, state separately the factual basis for Your contention that You are not  
13           legally liable for that Fire;  
14          d. For each Fire, identify separately all witnesses that support Your contention that You  
15           are not legally liable for that Fire;  
16          e. For each Fire, identify separately all physical evidence that supports Your contention  
17           that You are not legally liable for that Fire; and  
18          f. For each Fire, identify separately all documents (listed by Bates Number) that support  
19           Your contention that You are not legally liable for that Fire.

20  
21           **Dated: August 22, 2019**

22           BAKER & HOSTETLER LLP

23  
24          By: /s/ Robert Julian  
              Robert Julian

25           *Counsel to the Official Committee of Tort  
26           Claimants*